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3 (admitted *pro hac vice*)
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8 Attorneys for Defendants Brocade
9 Communications Systems, Inc., Judy Bruner,
Lloyd A. Carney, Renato A. DiPentima,
Alan L. Earhart, John W. Gerdelman,
10 Kim C. Goodman, David L. House,
L. William Krause, David E. Roberson,
11 and Sanjay Vaswani

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

15 BOBBY M. MATHEW, Individually and on) CASE NO.: 3:17-CV-00237-EMC
16 Behalf of All Others Similarly Situated,)
17 Plaintiff,) STIPULATION AND [PROPOSED]
18 vs.) ORDER EXTENDING TIME TO
19 BROCADE COMMUNICATIONS SYSTEMS,) RESPOND TO COMPLAINT
INC., BROADCOM LIMITED, BROADCOM)
20 CORPORATION, DAVID L. HOUSE, LLOYD)
A. CARNEY, JUDY BRUNER, RENATO A.)
21 DiPENTIMA, ALAN L. EARHART, JOHN W.)
GERDELMAN, KIM C. GOODMAN, L.)
22 WILLIAM KRAUSE, DAVID E. ROBERSON)
and SANJAY VASWANI,)
23 Defendants.)
24 _____)

Before: Hon. Edward Milton Chen
Complaint Filed: January 18, 2017

1 WHEREAS, Plaintiff Bobby M. Mathew (“Plaintiff”) filed his Complaint for Violation
 2 of the Federal Securities Laws on January 18, 2017 (“Complaint”) against Brocade
 3 Communications Systems, Inc., David L. House, Lloyd A. Carney, Judy Bruner, Renato A.
 4 DiPentima, Alan L. Earhart, John W. Gerdelman, Kim C. Goodman, L. William Krause, David
 5 E. Roberson and Sanjay Vaswani (collectively, “Brocade Defendants”), Broadcom Limited, and
 6 Broadcom Corporation;

7 WHEREAS, Brocade Defendants waived service of the Complaint, and their responses to
 8 the Complaint are currently due April 3, 2017;

9 WHEREAS, the Court has ordered this case related to five other cases currently pending
 10 in the Northern District of California, entitled *Steinberg v. Brocade Communications Systems, Inc., et al.*, Case No. 3:16-cv-07081-EMC, *Gross v. Brocade Communications Systems, Inc., et al.*, Case No. 3:16-cv-07173-EMC, *Jha v. Brocade Communications Systems, Inc., et al.*, Case No. 3:16-cv-07270-EMC, *Bragan v. Brocade Communications Systems, Inc., et al.*, Case No. 4:16-cv-07271-EMC, and *Chuakay v. Brocade Communications Systems, Inc.*, et al., Case No. 3:17-cv-00058-EMC;

16 WHEREAS, counsel for Plaintiff and counsel for Brocade Defendants have stipulated
 17 that Brocade Defendants need not answer the Complaint and shall meet and confer on a schedule
 18 after consolidation of this case and the above-referenced cases and after the appointment of a
 19 lead plaintiff and lead counsel pursuant to the Private Securities Litigation Reform Act of 1995
 20 and the lead plaintiff’s filing of a consolidated amended complaint;

21 NOW, THEREFORE, the parties, by and through their respective counsel, stipulate and
 22 agree as follows:

23 1. Brocade Defendants shall not be required to, and shall not waive any rights,
 24 arguments, or defenses by waiting to, answer, move, or otherwise respond to the Complaint in this
 25 action;

26 2. Brocade Defendants and Plaintiff shall meet and confer on a schedule after
 27 consolidation and after the appointment of a lead plaintiff and lead counsel pursuant to the Private
 28

1 Securities Litigation Reform Act of 1995 and the lead plaintiff's filing of a consolidated amended
2 complaint;

3 3. Nothing in this Stipulation shall be construed as a waiver of any of Brocade
4 Defendants' rights or positions in law or in equity, or as a waiver of any defenses that the Brocade
5 Defendants would otherwise have, including, without limitation, jurisdictional defenses.

6 IT IS SO STIPULATED.

7 Dated: February 16, 2017

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
BORIS FELDMAN

9
10 By: /s/ Boris Feldman
Boris Feldman

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14 Attorneys for Defendants Brocade
15 Communications Systems, Inc., Judy Bruner,
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Alan L. Earhart, John W. Gerdelman, Kim C.
Goodman, David L. House, L. William Krause,
David E. Roberson, and Sanjay Vaswani
17

18 Dated: February 16, 2017

ROBBINS GELLER RUDMAN & DOWD LLP
DAVID T. WISSBROECKER

19 By: /s/ David T. Wissbroecker
David T. Wissbroecker

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24 Attorneys for Plaintiff

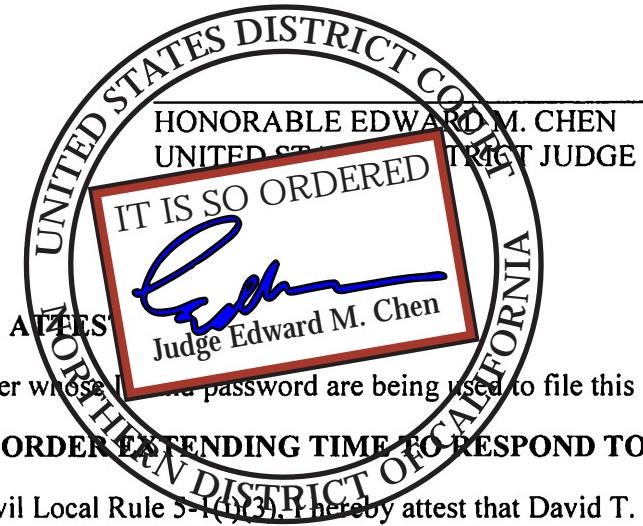
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2 **[PROPOSED] ORDER**
3

4 **GOOD CAUSE HAVING BEEN SHOWN**, it is hereby ordered that:

- 5 1. Brocade Defendants will not be required to, and shall not waive any rights, arguments, or
6 defenses by waiting to, answer, move, or otherwise respond to the Complaint in this action;
- 7 2. Brocade Defendants and Plaintiff shall meet and confer on a schedule after consolidation
8 and after the appointment of a lead plaintiff and lead counsel pursuant to the Private
9 Securities Litigation Reform Act of 1995 and the lead plaintiff's filing of a consolidated
10 amended complaint;
- 11 3. Nothing in this Stipulation shall be construed as a waiver of any of Brocade Defendants'
12 rights or positions in law or in equity, or as a waiver of any defenses that Brocade
13 Defendants would otherwise have, including, without limitation, jurisdictional defenses.

14 **IT IS SO ORDERED.**

15 DATED: 2/21/17



16
17
18 I, Boris Feldman, am the ECF user whose [redacted] password are being used to file this
19 STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO
20 COMPLAINT. In compliance with Civil Local Rule 5-1(f), I hereby attest that David T.
21
22 Wissbroecker has concurred in this filing.

23
24 Dated: February 16, 2017

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

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26 By: /s/ Boris Feldman
Boris Feldman